

The Honorable Marsha J. Pechman

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

RYAN KARNOSKI, et al.,

*Plaintiffs,*

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States, et al.,

*Defendants.*

Case No. 2:17-cv-01297-MJP

**DECLARATION OF RYAN  
KARNOSKI IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
SUMMARY JUDGMENT**

I, Ryan Karnoski, declare as follows:

1. My name is Ryan Karnoski. I am a plaintiff in the above-captioned action. I have actual knowledge of the matters stated in this declaration.

2. I am a 23-year-old man and I live in Seattle, Washington with my wife. I am currently registered with the Selective Service.

3. I am a member of both the Human Rights Campaign and the American Military Partner Association.

4. I am a mental health clinician in Seattle, Washington, and I would like to put my social work skills to use for the military. Social work is an area for which there can be significant need in the military, including in the Army and the Navy.

5. I hold a Masters in Social Work from the University of Washington School of Social Work's Child Welfare Training Advancement Program. Given that I hold a master's

1 degree, I aspire to serve as an officer in the military.

2 6. I come from a family with a legacy of military service. My grandfather and step-  
3 grandfather served in the Army during the Korean War, and I have other relatives who have  
4 served in the Army and Navy.

5 7. My desire to join the military came into sharper focus following the death of my  
6 cousin, who was killed in action in Afghanistan in 2009. My cousin's death—and the toll that it  
7 took on surviving family members—further impressed upon me the tremendous sacrifice that  
8 service members make for our country. I also realized my own desire to serve in the military was  
9 motivated by more than simply family legacy: it was a personal calling and it is something that I  
10 have long dreamt of being able to fulfill.

11 8. I am transgender. I was assigned the sex of female at birth. However, I have  
12 known for many years, since approximately early 2012, that I am male.

13 9. I began living openly as male in 2014.

14 10. In consultation with health care professionals, I have taken clinically appropriate  
15 steps as part of my medical transition.

16 11. I have taken legal steps to transition. In March of 2014, I legally changed my first  
17 name to Ryan. At that time, I also changed my name and gender marker to male on my driver's  
18 license, birth certificate, social security card and records, and passport.

19 12. Because I have wanted to enlist in the military for many years, I have followed  
20 the policies about service by transgender people closely.

21 13. On June 30, 2016 Secretary of Defense Ash Carter announced a new policy that  
22 lifted the ban on current transgender service.

23 14. I remember reading Secretary Carter's contemporaneous public statement. He  
24 said:

25 We're talking about talented Americans who are serving with distinction or who  
26 want the opportunity to serve. We can't allow barriers unrelated to a person's  
27 qualifications prevent us from recruiting and retaining those who can best  
28 accomplish the mission.

15. His announcement made me feel like I could finally be respected as an equal by

1 my government. Effective immediately on June 30, 2016, transgender military members were  
2 allowed to serve openly. Additionally, the new policy moved the military one step closer towards  
3 allowing transgender people to accession or commission into the military by initiating a process  
4 towards developing a practice and policy that would be inclusive of transgender individuals  
5 wishing to serve. I was so excited to be one step closer to helping fill the significant need to  
6 support our troops and their families, many of whom need mental health support to deal with the  
7 burdens that come with military service.

8 16. As further detailed below, I am ready and able to pursue a military career. In fact,  
9 I contacted military recruiters in or around September 2016, but I was open about my  
10 transgender status and discussed with a recruiter having to wait until the current accessions bar  
11 was lifted. I was referred to recruiting offices in King County, Washington, as my point of  
12 contact for further communications regarding my accession.

13 17. On July 26, 2017, President Trump posted three tweets that introduced a reversal  
14 of the inclusive policy for current and prospective service members, and later issued a  
15 memorandum ordering a ban on service by transgender people in the military.

16 18. I am devastated by the judgment within the White House about my ability to serve  
17 in the military, as well as by the implementation of President Trump's tweeted ban on  
18 transgender service. It has been painful to have to watch people in power and in the media talk  
19 about transgender people as if we are unfit to serve, even though we are able-bodied and desire  
20 to serve our country. I have seen first-hand the burdens and suffering imposed on families who  
21 have lost loved ones in combat, and want to devote my professional energy to helping people  
22 cope with those difficult circumstances. I have made careful plans to be able to do exactly that,  
23 and this new policy has upended them.

24 19. The President's tweets and the resulting policy have caused me to feel out of  
25 control of my professional future, and distressed that the military is turning away highly  
26 qualified people during a time of significant need. Military social workers can help service  
27 members and their families deal with anything from long separations from each other, to trauma  
28 experienced during service, and the medical and financial stresses that can flow from military

1 service. If I am kept from the equal opportunity of seeking commission into the military, then I  
2 will not only be foreclosed from career opportunities and advancement for which I would be  
3 eligible, but more importantly, will not be able to serve a population that has a crucial and urgent  
4 need for qualified mental health professionals.

5 20. I am a man, and I am fit to serve in the military as a man. I believe that this new  
6 policy directed by President Trump reflects deeply troubled misconceptions about transgender  
7 people not being real men and women. I believe that the transgender ban is an effort to erase my  
8 identity entirely.

9 21. By implementing this discriminatory ban, the President of the United States, my  
10 country, the Secretary of Defense, and the Department of Defense have sought to mark me as  
11 inferior, marginalize me, and stigmatize me. In doing so, they have caused me great distress,  
12 discomfort, and pain.

13 22. I intend to join the military, although I also want to be reasonably certain that I  
14 would not be at risk of discharge for being transgender before I do so. I understand that it  
15 remains possible that the military could nonetheless discharge transgender service members in  
16 the future, depending on the ultimate outcome of litigation. Because joining the military involves  
17 significant sacrifice, such as potentially foregoing stable employment and relocating, I want to be  
18 sure the rug will not be pulled out from under me again.

19 23. In addition, the precise path I take to join the military depends on the outcome of  
20 my application to a PhD program at UC Berkeley's School of Social Welfare. If accepted into  
21 the program, which would begin in the fall, I would likely pursue the Army or Navy Reserve or  
22 the National Guard, which would allow me to pursue my degree at the same time. If not, I would  
23 likely seek commission into the military for active duty.

24 24. I have engaged in speech and conduct disclosing my transgender status and  
25 expressing my gender identity and want to continue to be able to do so. For example, it is critical  
26 to me to be able to express that I am a man, and for others to understand that I am male.

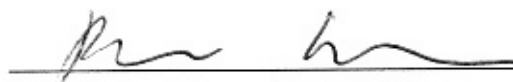
27 25. All that I want is to live openly as the man I am and to be treated with respect and

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1 dignity by the military.  
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3 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the  
4 United States of America that the foregoing is true and correct.  
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6 DATED: January 20, 2017  
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8 Ryan Karnoski  
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**CERTIFICATE OF SERVICE**

The undersigned certifies under penalty of perjury under the laws of the United States of America and the laws of the State of Washington that all participants in the case are registered CM/ECF users and that service of the foregoing documents will be accomplished by the CM/ECF system on January 25, 2018.



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